

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

	X	
	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
	X	

**STIPULATION FOR WITHDRAWAL OF  
SATISFIED CLAIM OF THE CITY OF DEARBORN**

The City of Dearborn and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the *Order Withdrawing Satisfied Claim of the City of Dearborn* attached hereto as **Exhibit 1**.

1. On February 12, 2014, the City of Dearborn filed its proof of claim [Claim No. 859] (the “Claim”) in the amount of \$5,476.30.
2. There are no outstanding pre-petition amounts owed to the City of Dearborn by the City.
3. In the ordinary course of its business, the City has paid the City of Dearborn all of the outstanding amounts sought in the Claim.
4. The City of Dearborn hereby withdraws the Claim in its entirety because the Claim has been fully satisfied.
5. Nothing in this Stipulation or the proposed order attached hereto as Exhibit 1 addresses any post-petition claims which have arisen or may arise between the City and the City of Dearborn. Both parties fully reserve all of their respective rights with respect to any other post-petition claims.

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** withdrawing the Claim.

Respectfully submitted by:

<p>By: <u>/s/ William M. DeBiasi (w/ permission)</u> William M. DeBiasi City of Dearborn, Department of Law 16901 Michigan Ave, Ste 14 Dearborn, MI 48126 Phone: (313) 943-2307 wbebiasi@ci.dearborn.mi.us  <i>Counsel to City of Dearborn</i></p>	<p><b>FOLEY &amp; LARDNER, LLP</b></p> <p>By: <u>/s/ Jeffrey S. Kopp</u> Jeffrey S. Kopp (P59485) John A. Simon (P61866) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jkopp@foley.com jsimon@foley.com afromm@foley.com  <i>Counsel to the City of Detroit, Michigan</i></p>
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Dated: March 10, 2015